

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MARYLAND

USDC - BALTIMORE
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HD

DEBORAH MORRIS - PRO SE

Rcv'd by: AN

Plaintiff

V.

Civil Action No. SAG 25 CV 0435

DONALD TRUMP, IN HIS OFFICIAL
HIS OFFICIAL CAPACITY AS
PRESIDENT OF THE UNITED STATES,
ELON MUSK, USDS ADMINISTRATOR,
THE U.S. DOGE SERVICE TEMPORARY
ORGANIZATION and ITS ASSOCIATION - IN
FACT, U.S. OFFICE OF MANAGEMENT AND
BUDGET; MATTHEW J. VAETH, IN HIS
OFFICIAL CAPACITY AS ACTING DIRECTOR
OF THE U.S. OFFICE OF MANAGEMENT
AND BUDGET; U.S. GENERAL SERVICES
ADMINISTRATION; STEPHEN EHIKIAN, IN
HIS OFFICIAL CAPACITY AS ACTING
ADMINISTRATOR AND DEPUTY
ADMINISTRATOR OF THE GENERAL
SERVICES ADMINISTRATION, U.S.
DEPARTMENT OF THE TREASURY;
SCOTT BESSENT, IN HIS OFFICIAL
CAPACITY AS SECRETARY OF THE
TREASURY; PATRICIA COLLINS IN HER
OFFICIAL CAPACITY AS TREASURER OF
THE U.S.

REQUEST EMERGENCY
TEMPORARY RESTRAINING
ORDER UNDER FEDERAL
RULE OF CIVIL PROCEDURE
65(B)

Defendants

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF SOUGHT
FOR VIOLATION OF MY CONSTITUTIONAL AND CIVIL RIGHTS**

INTRODUCTION

1. This action seeks declaratory and injunctive relief and vacatur under the Administrative Procedure Act (“APA”) with respect to *the Establishment of a Temporary Organization known as “the U.S. DOGE Service Temporary Organization”* hereby referred as {USDS} implemented as of January 20, 2025 Presidential Executive Order.

2. Plaintiff states because of this January 20, 2025 Presidential Executive Order(s) that brought to bear such inferior Service Temporary Organization as “the U.S. DOGE” with Elon Musk named a “special government employee” to President Trump and Administrator of USDS has done so to manipulate and exploit the Federal Government Old Information Technology Systems by allegedly being a temporary Administrator to reorganize the Federal Government Agency Aging IT Legacy Systems after which the Private Enterprise would acquire the rights of future funding obligations for the Temporary Agency. Once the timeline runs no doubt this alleged reorganization scheme will be to ultimately flipped this new agency to a PRIVATE Quasi- Government Funded Enterprise [such as Amtrak] headed by Elon Musk Personally disallowing any kind of Federal Government Oversight or enforcement of Federal Laws with the main goal of Elon Musk and his enterprise personal Benefit and not for the good of myself or any other American Citizen.

3. The Presidential Executive Order of January 20, 2025 creation of such USDS Temporary Organization {all} Association-In- Fact Agencies {Private Contractors }do sanction this Private Enterprise to have exclusive access to all of Plaintiff’ Confidential/Personal/Private

Information without my explicit permission or consent to have access to, thereby, have violated, breached, and has done unauthorized acts that have fundamentally taken away my freedoms and rights as Protected under the Constitution.

4. This Presidential Executive Order knowingly have not made provisions and regulations by which this USDS Temporary Organization are to be governed by -thereto allowing for blanket violation of Plaintiff Constitutional Rights and Protection under Federal and State Laws.

5. Defendants having full knowledge of the need for a complete overhaul of the Extremely Diverse Federal Government IT Systems (per the 2016 GOA Study- that President Trump acquired when entering his first term of office in 2017) those deteriorating IT systems secret door that ties the entire Federal Government together. Let's be clear here this veiled secret provides the master key to the Chest of Gold from the Federal Government Treasury in perpetuity exclusively to Defendants once out of Public Office.

[The Government Accountability Office (GAO) is known as "the investigative arm of Congress" and "the congressional watchdog." GAO supports the Congress in meeting its Constitutional responsibilities and helps improve the performance and accountability of the federal government for the benefit of the American people]

This Plan began formulating when Defendant President Trump first took office in 2017. Prior to 2017 Defendant Musk had previously developed favorable Political Relations along Exclusive Republican Party Lines that have allowed him to receive Government subsidies helping Elon Musk to attain \$13.3 billion net worth, therefore, giving him an open door preferential treatment of lobbying for his own Private Interests within the Government Executive regime. Musk subsidies were to support his Private Enterprise Private Businesses growth of Automative Company, Social Media and Space Company nothing to do with creating or developing new products to replace any older IT Systems infrastructures such as the ones currently being used by

All Federal Governments Agencies, Departments, Courts, Congressional Offices, Senate Offices and U.S. Military. At best this temporary time period of Musk does allow for the startup of such PRIVATE Quasi- Government Funded Enterprise for sure he will be Board Chairman of.

6. Elon Musk as a "Special government employee" is to serve in an **ADVISORY** capacity to lend his expertise on a **TEMPORARY BASIS** that can only be 130 days during any one year. Musk's SpaceX has recorded approximately \$3.3 billion in unclassified prime revenue over the last past 12 months, according to USASpending.gov.

7. Federal ethics rules require Musk to recuse himself from any decisions that he knows can effect his financial interests- But Musk has NOT done so.

8. Thou National-security conflict of interest Musk's financial disclosure forms are confidential, they still should appear in the database of the Federal Office of Government Ethics as having filed this FORM 450 Financial Disclosure- these Documents are no where to be found. These disclosure forms require a wide range of information on assets and resources of income, including for his Spouse(s) and dependent children. Other required information includes liabilities, gifts and travel reimbursements.

9. Musk's SpaceX does business primarily with NASA and the Air Force, which have respectively have awarded the Company \$1.7 billion dollars and \$1.3 billion during the past 12 months. The Defense Information Systems Agency has awarded \$199.2 million in obligations to SpaceX over that same time frame. No other Business or agency has ever had more than 0.01% of SpaceX's contract obligations in the history of Federal Government Procurement history.

10. Musk's Starlink satellite communications business, is a subsidiary of SpaceX-

Starlink's revenue rolls up under SpaceX. The X Social Media Platform does not show significant federal revenue but still does generate federal dollars.

11. Under this Presidential Executive Order it designated the contracting power (with use of Federal Dollars) directly to Defendant Musk (Administrator) for temporary staffing of USDS - Defendants conspired to Create this fictional temporary agency {enterprise} this way so to bypass the regulatory requirements, processes and clearances for onboarding of [be it long term or temporary] contractors or employees accessing/handling of sensitive/confidential/classified/private/public/Governmental - areas/data/information/Financial transactions/information etc.. Bottom line Defendant Musk in conjunction with Defendant(s) Association-In-Fact Agencies {Private Contractors } Temporary Agency have at will taken over/ seized control of All Government IT Systems, data information as listed in GOA 2016 Study and Report to Congressional Committees January 2025 GAO-25-107852 United States Government Accountability Office without any restrictions to do with as they desire.

12. The vagueness of this Presidential Executive Order January 20, 2025 does allow Defendant Musk action and activities to go unchecked with all other Defendants turning blind eye allowing him to exceed far beyond the Authority of Administrator of USDS and Special Employee status of Consulting Services to President Donald Trump.

13. Elon Musk, USDS Administrator and The U.S. DOGE Service Temporary Organization and its Association -In-Fact having no legal limits or oversight have been Falsely working more than the number of days allowed and are doing functions that aren't really special government employee(s) responsibility's. At minimum these activities falls under the Ethics Of Government Act of 1978, Elon Musk and all Association-In-Fact financial disclosure must be publicly

available- to which none are in Violation of Federal Law.

14. The Presidential Executive Order of January 20, 2025 as it relates to these matters have intentionally intermingled Different Governmental Department's procedures and purposes into this Executive Order that has created chaos throughout the Federal Government mounting such formidable take over of high sensitive areas of the Federal Government, subsequently, allowing for patterns of gaping disparities fostering widespread wrongful activities within all Federal Government Departments and Agencies. Such ex parte way of governance redacts Plaintiff Constitutional and Civil Rights leaving the security of my Personal, Private information, data and yes LIFE in the hand of unknown strangers to do with as they choose - For which Plaintiff seek Reparation through the Court.

15. Plaintiff has been made aware as of February 2, 2025, the President and Treasury Secretary, directed Treasury to grant expanded access to BFS payment systems to political appointees and "special government employees" for reasons that have yet to be provided, although one apparent purpose, upon information and belief. Upon information and belief, one purpose is to allow DOGE to advance a stated goal to block federal funds from reaching beneficiaries who do not align with the President's political agenda. For example, DOGE was tasked with freezing payments issued by the U.S. Agency for International Development ("USAID") and sought access to BFS payment systems to accomplish that goal. Virtually unfettered access to BFS payment systems was granted to at least one 25-year-old DOGE associate, Mark Elez, who, on information and belief, had the authority to view or modify numerous critical files. Indeed, reports indicate that Elez had administrative privileges over the BFS payment system's code, giving him the ability to alter user permissions and "read and write" code—even if the associate had "read-only" access to the system's data. Elez has since resigned from DOGE after being linked to racist public social media posts.

16. Plaintiff out of fears and anxiety over the Information being released daily into the Public, I found myself trying to get control of these fears by trying to get some semblance of answers from the Federal Government departments and agencies that I have entrusted my lifelong information and financial earnings with only to encounter barriers of telephone numbers that have become inaccessible or messages referring me to websites that provide nothing more than a "Sorry for the inconvenience".

JURISDICTION AND VENUE

17. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 2201(a). Jurisdiction is also proper under the judicial review provisions of the Administrative Procedure Act,

18. U.S.C. § 702. 5. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b)(2) and (e)(1). Defendants are United States agencies or officers sued in their official capacities. Plaintiff, Maryland Resident is a resident of this district, and a substantial part of the events or omissions giving rise to this Complaint occurred and continue to occur within the Baltimore City District of Maryland.

PARTIES

A. Plaintiff

19. Deborah Morris Pro Se is an elderly, disabled retired worker and former business owner that was born and lived in Philadelphia, Pennsylvania until 2015 but currently is a Resident of Baltimore Maryland.

B. Defendants

20. Defendant Donald J. Trump is the President of the United States. He is responsible for the actions and decisions that are being challenged by Plaintiffs in this action and is sued in his official capacity.

21. Defendant the United States Office of Management and Budget (OMB) is a cabinet agency within the executive branch of the United States government. The Office of Management and Budget is responsible for oversight of federal agencies' performance and the administration of the federal budget. 31 U.S.C. § 501.

22.. Defendant Matthew J. Vaeth is the Acting Director of the Office of Management and Budget, and that agency's highest ranking official. He is responsible for overseeing OMB, providing direction and leadership to the executive branch on financial management matters by establishing financial management policies and requirements, including being responsible for authoring the OMB Directive and ensuring that its directions are implemented by all federal agencies that provide relevant funding and support. He is sued in his official capacity. 31 U.S.C. §§ 502, 503; "President Trump

Announces Acting Cabinet and Cabinet-Level Positions” (Jan. 20, 2025) (“Acting Designations EO”).

23. Defendant Stephen Ehirian is the Acting Administrator and Deputy Administrator Of The General Services Administration and that agency’s highest ranking official. He is responsible for overseeing GSA’s nationwide real estate portfolio of over 360 million rentable square feet, over \$110 billion dollars in products and services through federal contracts, and the delivery of technology services across dozens of federal agencies that serve millions of people. He is responsible for overseeing GSA providing direction and leadership to the executive branch on financial management matters by establishing financial management policies and requirements, including being responsible for authoring the OMB Directive and ensuring that its directions are implemented by all federal agencies that provide relevant funding and support. He is sued in his official capacity. 31 U.S.C. §§ 502, 503; “President Trump Announces Acting Cabinet and Cabinet-Level Positions” (Jan. 20, 2025) (“Acting Designations EO”). As an appointee of President Donald J. Trump, he is to accelerate the adoption of technology throughout government, is to execute and implement government procurement expeditiously while working closely with the U.S. DOGE Service Temporary Organization (Established Jan. 20, 2025).

24. Defendant Elon Musk was appointed Temporary Administrator (Jan. 20, 2025) for the U.S. DOGE Service Temporary Organization (Established Jan. 20, 2025 - “Acting Designations EO”) and holds the position of Temporary Special Employee acting as governed under **GENERAL SERVICES ADMINISTRATION** Washington, DC 20405 {GSA ORDER SUBJECT: Temporary and Term Employment and Appointments HRM9316.1A February 5, 2024}. Under Presidential Order (January 20, 2025 -“Acting Designations EO”), does deceptively Establishes such a dual Position - Elon Musk Appointment as to be President Trump PersonalConsult acting as governed under **ADMINISTRATIVE PROCEDURE ACT - {5 U.S.C. §551 (2)(3) United States Code, 2017 Edition}** but exclusively at the {WILL AND

DIRECTING } of President Donald Trump.

25. Defendant the United States Department of the Treasury is a cabinet agency within the executive branch of the United States government. 31 U.S.C. § 301. The Department of the Treasury is responsible for ensuring the financial security of the United States.

26. Scott Bessent is the Secretary of the Department of the Treasury and responsible for the operations of the Department of the Treasury, and management the finances of the United States. He is sued in his official capacity. 31 U.S.C. § 301.

27. Patricia Collins is the Treasurer of the United States and responsible for the management of the finances of the United States. She is sued in her official capacity. 31 U.S.C. § 301.

28. Defendants the U.S. DOGE Service Temporary Organization (Established Jan. 20, 2025 - "Acting Designations EO") and holds the positions of Temporary Special Employees (Association-In-Fact) acting as governed under **GENERAL SERVICES ADMINISTRATION** Washington, DC 20405 {GSA ORDER SUBJECT: Temporary and Term Employment and Appointments HRM9316.1A February 5, 2024}.

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

C. STATUTORY FRAMEWORK RELEVANT TO PLAINTIFF COMPLAINT

a. Constitution

i. Civil Rights Act of 1866, Civil Rights Act of 1964

ii. Bill of Rights

29. The American Constitution wasn't founded to be a strict rule book more a written

down Paradigm - a model and pattern that explains the underlying spirit, while outlining the shape. Our Constitution created such Paradigm to our particular system of Democratic Government specifying National Liberties and Laws in which our Society must operate. Principal are established and boundaries are created that make own framework of laws by which this country is governed.

30. Founding Fathers created three branches of government under the Constitution to prevent any single branch from becoming too powerful, establishing a system of "checks and balances" where each branch can limit the power of the others, ensuring a balanced distribution of authority and safeguarding against tyranny; the concept known as "separation of powers.". U.S. Federal Government is made up of three branches: legislative[congress and senate], executive[president] and judicial [courts]. This was done to ensure the government is effective and citizens' rights are protected, each branch has its own powers and responsibilities, **including working with the other branches.**

The United States is to be a representative democracy. Executive and Legislators are elected by citizens. We Citizens vote for those government officials. These officials working TOGETHER under oath to the CONSTITUTION are to represent "WE THE PEOPLE" ideas and concerns in government through the making of LAWS FOR THE GOOD OF ALL PEOPLE .

31. In its original form, the Constitution did not fully provide for what is now called a liberal democracy -a system with free and fair elections, individual rights, limits on the power of the majority as well as government officials, and the rule of law. Over the past 233 years, a modern liberal democracy ultimately, though painfully, emerged--based both on the verbal Legislative promises now contained in an amended Constitution as well as informal norms as contained in an Executive Order.

32. Our Democratic system depends on a delicate balance-- government strong enough to capably respond to pressing national problems, yet not so unchecked that officeholders are able to shrug off limits on power and rule by dictatorship. A government too weak to carry out its responsibilities is a failed government. A government with a president who rejects the notion of limits on his or her power is a failed government.

33. Elected officials are to be the watchmen of the Constitution who's allegiance should be indisputable whenever it comes to preserving this nation Constitution and its fundamental law that establishes the core values of our nation, also, protecting the Rights of "We The People" that selected them-no matter what side of the aisle your seat is on, whether in Congress or Senate. During the ebb of this Country times "We The People" are in the midst of a failed governmental body that have been derelict in their duties while asleep at their elected post. This failed government body is the direct result of allowing itself to be Politicalized rather than being "CONSTITUTIONALIZED" causing chaos within the legislative body.

34. This failed Government have forsaken "We The People" and allowed Plaintiff and others folks in this country Constitutional Rights to be hauled away and given over to the Private hangman(s) of Elon Musk and DOGE to dispose of - solely with the stroke of pen on such Presidential Executive Order of January 20, 2025 by President Donald Trump for his revenge against the opposition Political Party.

35. The fact that a coup is being conducted within the Legislative Body and the President is not being immediately impeached and removed from office is a sign of profound democratic erosion. In a functioning system, Republicans would be joining with Democrats to immediately remove Trump from office or use its tools to stop the illegal Executive Orders he keeps pushing out almost daily.

36. While most members of DOGE appear to have been hired as "special government employees" under the color of 18 U.S.C. § 202(a), many of the DOGE members given access to BFS were not employees of Treasury, a violation of the Privacy Act. In addition, when these special government employees' 130 days of federal service is up, they will be able to return to positions in the private sector.

37. The conduct of DOGE members presents a unique security risk to Plaintiff and Plaintiff State residents whose data is held by BFS, given that DOGE employees have already reportedly set up an unauthorized commercial server at another federal agency without a privacy impact assessment as required by the 2002 E-Government Act. Access by DOGE employees to BFS is likely to present even greater risks to the security and privacy of Plaintiff and other Maryland residents' data.

38. Unsecured data is susceptible to cyber attacks and identity theft. Identity theft would have a significant impact on Plaintiff, beyond the financial well-being of Plaintiff.

39. DOGE has rapidly accumulated immense power within the Trump administration, and there is reason for Plaintiff to be concerned that Treasury payments are beginning to be blocked. Responding to a social media post about certain federal program grants awarded by the Department of Health and Human Services disbursed by BFS, Musk put it more directly in a post on February 2, 2025 – the day he and his DOGE team gained access to BFS’s payment systems: “The @DOGE team is rapidly shutting down these illegal payments.” DOGE Defendants have not provided any basis to assert that transactions pursuant to numerous federal programs created to carry out laws duly enacted by Congress are “illegal payments.” Nor have they identified any authority in DOGE, or BFS for that matter, to “shut[] down” payments. These stopped federal programs payments have direct impact on the quality of my Life as an elderly, disabled person living solely on Social Security.

40. Secretary Bessent’s implementation of Treasury’s new broader access policy, allowing Musk and his DOGE team 62 to access BFS’s payment systems, was adopted without any public announcement or explanation. To date, Defendants have provided no reasons at all to justify the new policy, nor did Treasury conduct a privacy impact assessment prior to implementing the change.

41. According to public reporting, access by Mr. Musk, Mr. Krause, and other unidentified DOGE team members under the new policy to BFS’s payment systems includes “administrator-level privileges, including the ability to write code on the Payment Automation Manager [(PAM)] and the Secure Payment System [(SPS)].

42. “Administrator level” privileges includes the ability to log into agency servers through secure shell access, navigate the entire system file, change user permissions, and delete or modify files, including critical files.

43. Administrator level” access allows the user to have more than a “read only” functionality within the information system.

44. Even before its inception, DOGE members sought sensitive data information about the Treasury Payment Systems, including the code underwriting the Treasury payment systems. Consistent

with policy, a non-Treasury employee was denied access from any such information or access at that time. By Jan. 29, 2025, however, Secretary Bessent changed policies and granted Mr. Musk and his DOGE team members access to the BFS Treasury payment systems. By granting DOGE members to access, the agency ignored the already existent policies and practices put into place to maintain the security of Treasury's sensitive systems. Secretary Bessent failed to offer any reasoning or findings as to why Treasury would change policies in contravention of the privacy policies.

The prior policy in place under Acting Secretary Lebryk

45. Upon information and belief, Musk and DOGE had signaled interest in accessing the Treasury systems between December of 2024 through January 20, 2025, but any of Musk's particular requests to access the Treasury systems was denied by then-Acting Treasury Secretary David Lebryk.

46. Upon information and belief, in connection with his role working with DOGE, Krause previously sought, but was denied, Treasury code information from Lebryk.

47. According to public reporting, despite DOGE team's representations that their goal was "to undertake a review of the [Treasury's] system," as evidenced in a Jan. 24, 2025 email exchange, Krause's DOGE-affiliated push for access to the Treasury payment system were actually intended to "receive access to the closely held payment system so that Treasury could freeze disbursements to the U.S. Agency for International Development ("U.S.A.I.D.")-sources reported from the New York Times.

48. Emails identified in the public reporting stated the that the purpose of Mr. Krause's DOGE-related access to the system was to "pause U.S.A.I.D. payments and comply with Mr. Trump's Jan. 20 executive order to halt foreign aid."

49. According to public reporting, Lebryk denied the request to grant Krause access to the systems; in a Jan. 24, 2025 email, Lebryk wrote, "I don't believe we have the legal authority to stop an authorized payment certified by an agency."

50. Upon information and belief, shortly after Lebryk denied Krause's access, Defendant Bessent placed former Secretary Lebryk (a career civil servant) on administrative leave, eventually pushing Lebryk out of the job days later, before granting Musk's DOGE access request to the Treasury systems.

51. According to public reporting, in further communicating about the denial of his access request, Krause urged Treasury to "hold payment at least to review the underlying payment requests from U.S.A.I.D. now so that we can be given more time to consult [the] State [Department].

CAUSES OF ACTION

D. { Violations of Plaintiff Constitutional and Civil Rights as relevant to "THE PRIVACY ACT- Handling of Plaintiff Private Information By Private Temporary Agency and Individuals without my Consent to use for own private personal Benefits }

52. The Plaintiff reallege and incorporate by reference the allegations set forth in the preceding paragraphs.

53. 5 U.S.C. § 552a(a)(1) – Agency - "[T]he term 'agency' means any Executive department, military department, Government corporation, Government controlled corporation, or other establishment in the executive branch of the [federal] Government (including the Executive Office of the President), or any independent regulatory agency.

The White House, federal courts, and entities merely linked to the government are not "agencies." With regard to the White House, courts have held that those components of the Executive Office of the President whose sole function is to advise and assist the President are not "agencies" for purposes of the Privacy Act. Courts have held Private entities are not "agencies."

For such entities of DOGE (Association-In-Fact) activities of complicity involving invasion of Federal IT systems, Databases, Records, informational systems of any kind does violate Plaintiff Constitutional and Civil Rights.

54. 5 U.S.C. § 552a(a)(2) – Individual [Defendant Elon Musk-The “Special Employee”] Courts have held should only have access to any of Plaintiff Information understand the “Freedom of Information Act” and his individual standing does not give him the privileged to access any of my Personal Information without my direct consent or permission. Direct Violation of my Constitutional and Civil Rights.

E. {Violation of Plaintiff Constitutional and Civil Rights - under “THE FALSE CLAIMS ACT” AS Relevant within the RICO ACT 31 U.S. Code § 3729, 18 U.S. Code § 287 - False, fictitious or fraudulent claims- False claims- Plaintiff consumer protection, commercial fraud, bribery, official corruption, and security violation}

55. Defendants -Elon Musk, USDS Administrator and The U.S. DOGE Service Temporary Organization and its Association -In-Fact having no legal limits or oversight have been Falsely working more than the number of days allowed and are doing functions that aren’t really special government employee(s)responsibility’s of which none have made Public any Financial Disclosure as required under the Ethics Of Government Act of 1978.

Defendants ongoing pattern activities of not making Public any financial Disclosures as required under Federal Law just confirms the total disregard of the laws for which President Trump Executive Order of January 20, 2025 claims would be adhering to.

PRAYER FOR REPARATIONS AND RELIEF

WHEREFORE, Plaintiffs respectfully prays that this Court enter an order against the Defendants as follows:

56. Do so Declare the Presidential Executive Order of January 20, 2025 known to be

“THE WHITE HOUSE ESTABLISHING AND IMPLEMENTING THE PRESIDENT’S
“DEPARTMENT OF GOVERNMENT EFFICIENCY” EXECUTIVE ORDER - had been
Order to exist without regard to legislative procedure and authority vested by the Constitution.
For such matters within the Order would require full legislative review and hearings to determine
whether the “Department of Government Efficiency” does meet Requirements under All Federal
Laws and be the determining body of its existence. Further this Order lacks any provisions for
Public engagement.

57. Do so Declare the Presidential Executive Order of January 20, 2025 does Violate
Plaintiff (and other Persons in commonality) Constitutional and Civil Rights.

58. Issue a temporary restraining order and preliminary and permanent injunctions
barring Defendants from granting access to Treasury Department payments or any other data
systems maintained by the Treasury Department containing personally identifiable information
and/or confidential financial information of payees to any person unless that person has passed
all background checks, security clearance, and information security training called for in federal
statutes and Treasury Department regulations, and otherwise excluding permanent political
appointees and special permanent government employees.

59. Plaintiff ask the Court to overturned the order for lack support by statute(s) and
the Constitution then Ordering all Federal Agencies and Departments directly disabled by the
Actions of the Order to be Protected and restored to full function immediately in the best
interests of Plaintiff/Public Privacy, Safety and National Security.

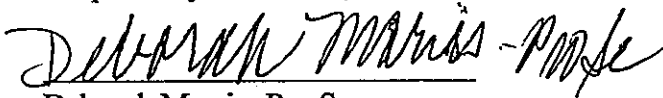
60. Plaintiff ask the Court to take the extraordinary measures {per the Court
authorized to do so under Federal Rule of Civil Procedure [Rule 66]} to Appoint special

receivership over Defendants -Elon Musk, USDS Administrator and The U.S. DOGE Service Temporary Organization and its Association -In-Fact to the Court with expertise to supervise the implementation of the extraordinary remedy of halting this Enterprise operations throughout the Federal Government Departments, Agencies, Courts and Military thereby ensuring no further damage and harm comes to the Public because of compelling evidence of serious issues involving imminent threat to Plaintiff & Public funds, Regulatory non-compliance and National security.

61. Grant such further relief as the Court deems just based on the facts and applicable.
62. Order such other relief as this Court deems just and equitable.

Respectfully Submitted,

Date: February 11, 2025

A handwritten signature in black ink, appearing to read "Deborah Morris - Pro Se", written over a horizontal line.

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attended 1/9 & 2/0